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**Exotic Metals Forming Company LLC**  
**Response to CERCLA 104(e) Information Request**

**Response to Question 1: Respondent Information:**

- a. Exotic Metals Forming Company LLC (EMFCO)  
5411 So. 226<sup>th</sup>  
Kent, WA 98032
- b. Doug A. Gines  
Vice President  
5411 S. 226<sup>th</sup> St. Kent, WA 98032  
T: 253-395-3710  
F: 253-872-8494
- c. Doug A. Gines  
Vice President  
5411 S. 226<sup>th</sup> St. Kent, WA 98032  
T: 253-395-3710  
F: 253-872-8494

With a copy to:

Margaret A. Yowell  
Foster Pepper PLLC  
1111 Third Avenue  
Suite 3400  
Seattle, Washington 98101

Telephone: 206-447-7290  
Fax: 206-749-1948

- d. EMFCO leased the building at 1303 So. 96<sup>th</sup> Seattle, WA 98108 from PF industries, Inc. from March 1978 to May of 1984. EMFCO purchased the former facility from Russak Investment Company in May of 1984. In October 1984, EMFCO entered into a Real Estate Exchange Agreement with Dale W. Sobek and Doriana J. Sobek, exchanging the former facility for land in Kent, WA. EMFCO then leased the former facility from the new owners until February 1986. Thereafter, EMFCO permanently relocated to Kent. Since 1986, EMFCO has been located in Kent.
- e. See Response to e above.
- f. From 1978 to 1986 EMFCO manufactured aviation sheet metal ducting at its former facility at 1303 S. 96th.
- g. To the best of EMFCO's knowledge, raw materials at its former facility were 625 & 718 Inconel, CP Titanium and 321 Stainless Steel. The solvents Acetone, Toluene, Stoddard, Methyl Ethyl Keytone, Isopropyl Alcohol and Trichloroethane were used for cleaning the raw material. As indicated on

**USEPA SF**



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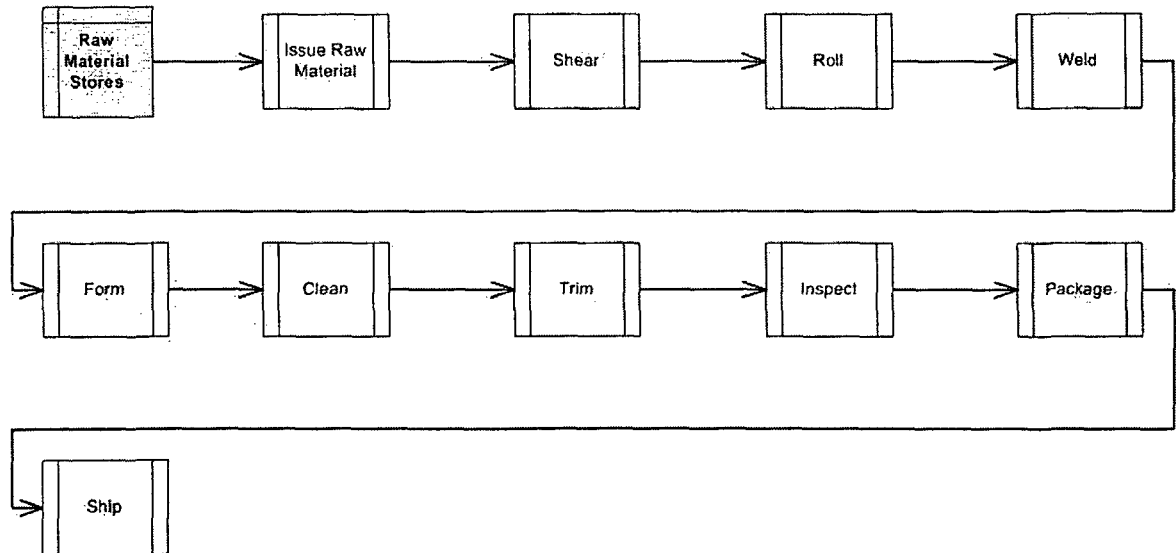
enclosed waste manifests, waste solvents generated from cleaning operations and other wastes were hauled away for proper disposal by Northwest EnviroService, Inc. and Van Waters & Rogers.

- h. EMFCO, its parent corporation, or other related or associated companies have not filed for bankruptcy. There are no subsidiaries of EMFCO.

**Response to Question 2: Site Activities and Interests:**

- a. Documents regarding ownership of the property are attached. To the best of EMFCO's knowledge after a detailed review, there are no documents regarding environmental conditions.
- b. EMFCO is not aware of any information responsive to this request.
- c. EMFCO is not aware of any past or planned dredging at this former facility.
- d.

**EMFCO  
Process Diagram**



From March of 1978 to February of 1984 EMFCO manufactured Aviation ducting at its former facility utilizing thin gauge (.010 to .045) sheet metal. The diagram above describes the steps used. Once material was issued to the shop a shear was used to cut blanks of the proper dimension. The blank was rolled into a cylinder or conical shape and manually welded. The welded blank was placed into a die and, using axial load bulge forming, the blank was pressed into the shape of the die. A lubricant such as lanolin was used to coat the part to facilitate smooth forming. After forming the part was cleaned using a solvent. The part was trimmed using a Libert scissor shear, inspected, packaged and shipped.

- e: See enclosed documents.
- f: We are unaware of any transformers or PCBs at the former facility
- g: Hangsterfer J2, Lanolin and Way oil were used for lubrication of machinery at the former facility.
- h: We are unaware of any responsive documents.
- i: We are unaware of any responsive documents.

**Response to Question 3: Information About Others:**

- a. Other than the ownership and lease information previously provided regarding the former facility and the waste haulers previously mentioned, EMFCO is not aware of any business relationships EMFCO had regarding the former site or operations thereon with any other entities.
- b. There were no tenants or lessees during the time that EMFCO operated at the former facility.
- c. Curtis Starkey; current EMFCO employee. 253-395-3710

**Response to Question 4: Financial Information:**

- a. Question 4.a. requests copies of all federal income tax documents, including all supporting schedules, for 2004, 2005, 2006, 2007 and 2008. EMFCO respectfully objects to this request as being overbroad, unduly burdensome and beyond the scope of authority granted to the U.S. Environmental Protection Agency in CERCLA Section 104(e). Further, given EMFCO's limited relationship to the Site and the fact that EMFCO has not operated at its former facility since 1986, these documents are not relevant and material to EPA's investigation. During the time that EMFCO owned and/or leased the property, it was a closely held company.
- b. EMFCO holds no financial interest in, control of, or a beneficiary of any assets (in the U.S. or in another country) that have not been identified in its federal tax returns and in the responses to requests above.
- c. EMFCO was not a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity during the time that EMFCO owned and/or leased the former facility.

**Response to Question 5: Insurance Coverage:**

- a. Question 5.a. requests copies of all property, casualty and/or liability insurance policies, and any other insurance contracts referencing the site or facility and/or EMFCO's business operation (including, but not limited to, Comprehensive

General Liability, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies). EMFCO respectfully objects to this request as being overbroad, unduly burdensome and beyond the scope of authority granted to the U.S. Environmental Protection Agency in CERCLA Section 104(e). Further, given EMFCO's limited relationship to the Site, these documents are not relevant and material to EPA's investigation.

Notwithstanding EMFCO's objections, to the best of EMFCO's knowledge, EMFCO no longer has any documents responsive to this request. Parker Smith and Feek was EMFCO's insurance broker who placed insurance for EMFCO during the period being investigated. We are investigating what insurance policies may have been in place.

- b. EMFCO does not have information about any additional insurance policies responsive to this request.
- c. Parker Smith and Feek was EMFCO's insurance broker who placed insurance for EMFCO during the period being investigated. We are investigating what insurance policies may have been in place.
- d. To the best of our knowledge, there were no claims made by or on behalf of EMFCO under any insurance policy in connection with the site.
- e. To the best of our knowledge, there were no settlements with any insurer in connection with the site, or for any claims for environmental liability during the time period under investigation.
- f. EMFCO respectfully objects to this request as being overbroad, unduly burdensome and beyond the scope of authority granted to the U.S. Environmental Protection Agency in CERCLA Section 104(e). Notwithstanding this objection, EMFCO does not have any responsive documents.
- g. EMFCO retains its documents at least for the periods of time mandated by law.

**Response to Question 6: Compliance with the Request:**

- a. Douglas Gines, Vice President, EMFCO prepared this response.
  - i. Debby Yaconetti; Controller was consulted.
  - ii: The documents reviewed are kept in EMFCO's offices at 5411 So. 226<sup>th</sup> St. Kent, WA 98032.

Nothing contained herein shall constitute or be deemed to be an admission of any fact, issue of law, responsibility or liability on the part of EMFCO, nor is it intended to or shall it be considered as a waiver of any defense, right or entitlement that EMFCO may possess now or in the future.

## DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent, and that the foregoing is complete, true and correct.

Executed on November \_\_, 2009



Signature

Douglas A. Gines  
Vice President, Exotic Metals Forming Company LLC  
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